

requirements, and the *Computer Inquiry* obligations. Combined, these requirements create a framework that extends beyond incumbent LECs. For example, since 1980, the Commission has required "all carriers owning basic transmission facilities" to disclose "all information relating to network design . . . to all interested parties on the same terms and conditions, insofar as such information affects either intercarrier interconnection or the manner in which interconnected CPE operates."⁵⁵

Third, there is no reasonable basis for treating carriers differently with respect to notice requirements where the ultimate goal of interoperability among local networks requires all interconnectors to cooperate. For competitive reasons, the Commission should not require a select group of telecommunications carriers to provide access to information relating to their network designs and exempt others. Such disparate treatment works against competitive neutrality and regulatory parity.

In light of the foregoing, the Commission should require all interconnecting carriers -- LECs, CLECs, and IXCs -- to provide notice and disclosure of network changes.

⁵⁵ *Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer II)*, 84 FCC Rcd 2d 50, 82-83 (1980).

CONCLUSION

For all of the foregoing reasons, GTE urges the Commission to take the following actions regarding reconsideration of the *Second Report and Order* :

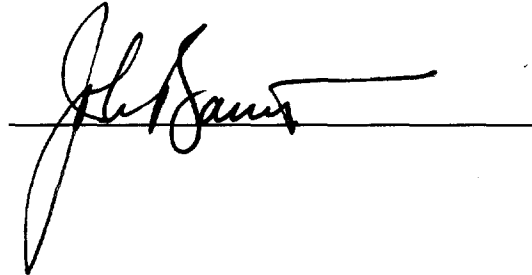
- reject requests to accelerate the implementation schedule for toll dialing parity both generally and in multi-state LATAs;
- clarify the standards both for waiving the dialing parity implementation deadlines and the prohibition against automatic assignment of new customers;
- clarify the operator and directory assistance rules to better protect proprietary interests;
- reject requests to impose further restrictions on the use of area code overlays and the recovery of numbering administration costs;
and

- modify the information disclosure requirements to conform to existing practices and extend such requirements to all telecommunications carriers.

Respectfully submitted,

GTE Service Corporation, on behalf
of its affiliated domestic telephone
operating and wireless companies

By:

A handwritten signature in black ink, appearing to read "John L. Bartlett", is written over a horizontal line.

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November 20, 1996

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, 1996, I caused copies of the foregoing "Opposition To And Comments On Petitions For Reconsideration And/Or Clarification" to be mailed via first-class postage prepaid mail to the following:

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